

REMARKS

Applicants have carefully reviewed and considered the Office Action mailed on January 25, 2008. Reconsideration is respectfully requested in view of the foregoing amendments and the comments set forth below.

By this Amendment, claims 1-20 are canceled and new claims 21-42 are presented. Accordingly, claims 21-42 are pending in the present application, 12 of the claims being independent and a total of 22 claims being presented. The small-entity claim fees for 9 additional independent claims over 3 and two total claims over 20 total \$995. The Director is authorized to deduct the small-entity claim fees from our Deposit Account No. 22-0261.

Claims 1, 4-5, 7, 10, 13 and 15-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,683,628 to Nakagawa al. (hereinafter referred to as “Nakagawa”) in view of U.S. Patent No. 6,920,614 to Schindler et al. (hereinafter referred to as “Schindler”). Claims 2 and 3 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Schindler in view of U.S. Patent No. 5,561,446 to Montlick. Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Schindler in view of U.S. Patent No. 5,583,323 to Zurstadt. Claims 8 and 12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Schindler in view of U.S. Patent No. 5,790,114 to Geaghan. Claim 9 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Schindler in view of U.S. Patent No. 4,538,993 to Krumholz. Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Schindler in view of U.S. Patent No. 5,689,562 to Hassan et al. (hereinafter referred to as “Hassan”). Claim 14 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Schindler in view of U.S. Patent No. 5,528,235 to

Lin et al. (hereinafter referred to as “Lin”). To the extent these rejections still apply, they are respectfully traversed.

The Applicants maintain that the independent claims previously on file are patentably distinct over the prior art relied upon by the Examiner. In particular, the Applicant maintains that the combination of Nakagawa with Schindler is improper. Nevertheless in the interests of moving this application towards allowance, Applicants cancel previously pending claims 1 to 20 and submits new claims 21 to 42. Accordingly, claims 21-42 are pending in the present application.

Claims 21 to 33

Independent claim 21 corresponds to a combination of previously pending claims 1, 2, 8, 9, 11 and 12. Independent claims 27 and 30 have all the corresponding limitations of independent claim 21.

Based on the comments in the Office Action, in order to allege finding of this combination of features in the prior art the Examiner would need to combine six prior art documents: Nakagawa, Schindler, Montlick, Geaghan, Krumholz and Hassan. The combination of such a number of documents to allegedly find the claimed features in itself points to the non-obviousness of the claimed features.

The feature of the remote devices transmitting only when requested to is presented in claim 21 in combination with the feature of the request for information be carried out by polling. According to the claimed invention set forth in claims independent claims 21, 27 and 30, the device onto which the image is projected is arranged to poll each remote device in turn, and only in response to a request when it is polled does a remote device transmit to the device onto which the image is displayed.

The Examiner relies upon Geaghan disclosure of giving priority to a pen when both pen and finger contact are detected as giving priority to a plurality of remote devices. Since Geaghan is concerned with pen and finger contact occurring at the same time, it does not address priority of remote devices as the pen is usually held by fingers. In addition, the Examiner turned to Geaghan for an alleged disclosure of polling, and turned to Hassan to allege that devices only transmit when in receipt of a request signal. However, in claim 21 (claims 27 and 30), it is essential that these features are intrinsically linked in order to facilitate communication between the remote devices and the communication hub, and the fact that the Examiner has had to select these two features separately from two separate documents, before combining them with other documents, shows that their combination is in fact not obvious. It is respectfully submitted that changes to the base reference Nakagawa would yield unpredictable results as at least three different systems are combined according to the Action.

Hassan and Geaghan disclose two distinct techniques. Hassan is not in the field of interactive display systems, and therefore one of ordinary skill in the art referring to Nakagawa or Geaghan would not turn to Hassan to improve an interactive display system. Even if they did, they are taught two distinct techniques (according to the Examiner). There is no suggestion that such techniques could be combined. Nor is there a known correlation between the prior art variable that was changed and the claimed effect as the Examiner is adding features to the base reference of Nakagawa.

The claimed invention recites a pointing device (e.g., equivalent to a pen) in combination with a plurality of remote signaling devices. The portion of Hassan which the Examiner highlights discloses that a control unit starts an image transmission process

by sending a request to a transmission unit. The transmission unit is a single unit. Hassan does not disclose how transmission is controlled where there is need to receive transmission from multiple units. The teaching of Hassan is therefore incompatible with the arrangement of the claimed invention, as set forth in claim 21.

In addition, claim 21 defines the feature of the pointing device taking precedence over the remote signaling devices, and the pointing device selectively enabling each remote signaling device. As argued above, the Examiner relies upon Geaghan to allege disclosure of the pointing device taking precedence over the remote devices. However, the Examiner then turned to Krumholz to allege disclosure of the pointing device selectively enabling the remote devices.

Geaghan discloses a technique for allowing a pen to take precedence over a finger when both are present. This is not a useful teaching in consideration of the features of claim 21, as it relates to two ‘devices’ (pen and finger) which are used on the interactive surface. Independent claim 21 does not define a pen in combination with a finger, and does not define anything other than a single pointer for use at the interactive surface. Thus claim 21 does not require discrimination between more than one device used at the interactive surface, and therefore the teachings of Geaghan are irrelevant. There is nothing in Geaghan which suggests the possibility of resolving a conflict between a pointer used at the interactive surface and a plurality of remote devices used, inherently, remote from the interactive surface.

Krumholz discloses that it is possible to prevent reception of signals from a particular computer to a central computer when there is a plurality of computers present. However there is nothing to suggest that this can be done under the control of an

additional input device, i.e. a pointer. In claim 21 it is essential that these features are intrinsically linked in order to manage interaction with the interactive system using multiple input devices of different types. The fact that the Examiner has had to select these two features separately from two separate documents, before combining them with other documents, shows that their combination is in fact not obvious.

Geaghan and Krumholz disclose two distinct techniques. Even if a person skilled in the art turned to them, they are taught two distinct techniques (according to the Examiner). There is no suggestion that such techniques could be combined in a predictable manner to achieve the claimed invention.

Regardless of the disclosure of each individual documents, the Applicants submit that independent claims 21, 27 and 30 cannot be rendered obvious by the skilled person when a skilled person would have to turn to six prior art documents order to find an aspect of the claimed invention by itself. This is particularly so because a number of the prior art documents relied upon by the Examiner are outside the field of interactive display systems.

Claims 34 to 36

Independent claim 34 corresponds to a combination of claims 1, 2, and 11 previously on file. Independent claims 35 and 36 have all the corresponding limitations of independent claim 34. Based on the comments in the Office Action, in order to allege finding of this combination of features the Examiner would need to combine four prior art documents: Nakagawa, Schindler, Montlick, and Hassan. As argued above, the combination of such a number of documents to allegedly find the claimed features in itself point to the non-obviousness of the claimed features.

Hassan is not directed to an interactive display system or such like and therefore its combination with the other technologies would not be predictable – there is no motivation for a skilled person to turn to Hassan. The portion of Hassan which the Examiner highlights discloses that a control unit starts an image transmission process by sending a request to a transmission unit. The transmission unit is a single unit. Hassan does not disclose how the transmission is controlled where there is a need to receive transmission from multiple units, as recited in the claimed invention. The teaching of Hassan is therefore in compatible with the recited arrangement of claims 34, 35 and 36.

Further the feature that the remote device can only transmit in response to a request signal means that the teachings of Schindler are further rendered incompatible with Nakagawa. In Schindler, the remote devices are control devices, which control the apparatus with which they are in communication. For example, a remote device may send a command to turn off a VCR. It would not be possible for such control devices to be adapted such that they can only transmit when requested to do so, as this is incompatible with their purpose. The teachings of Hassan and Schindler, at least, are therefore incompatible.

Claims 37 to 39

Independent claim 37 corresponds to a combination of claims 1, 2, 8, and 9 previously on file. Independent claims 38 and 39 have all the corresponding limitations of independent claim 37. Based on the comments in the Office Action, in order to allege finding of this combination of features the Examiner would need to combine five prior art documents: Nakagawa, Schindler, Montlick, Geaghan, and Krumholz. The combination of such a number of documents to allegedly find the claimed feature sin itself point to the

non-obviousness of the claimed features.

Geaghan discloses a technique for allowing a pen to take precedence over a finger when both are present. This is not a useful teaching in consideration of the features of claim 37, as it relates to two 'devices' (pen and finger) which are used on the interactive surface. Claim 37 does not define a pen in combination with a finger, and does not define anything other than a single pointer for use at the interactive surface. Thus, claims 37-39 does not require discrimination between more than one device used at the interactive surface, and therefore the teaching of Geaghan is irrelevant. There is nothing in Geaghan which suggests the possibility of resolving a conflict between a pointer used at the interactive surface and a plurality of remote devices used, inherently, remote from the interactive surface.

Krumholz discloses that it is possible to prevent reception of signals from a particular computer to a central computer when there is a plurality of computers present. However there is nothing to suggest that this can be done under the control of an additional input device, i.e. a pointer.

The claimed invention recites a pointing device (equivalent to a pen) in combination with a plurality of remote devices. The portion of Hassan which the Examiner highlights discloses that a control unit starts an image transmission process by sending a request to a transmission unit. The transmission unit is a single unit. Hassan does not disclose how transmission is controlled where there is need to receive transmissions from multiple units. The teaching of Hassan is therefore in compatible with the arrangement of claim 34.

Claims 40 to 42

Independent claim 40 corresponds to a combination of claims 1, 2, and 12 previously on file. Independent claims 41 and 42 have all the corresponding limitations of independent claim 40. Based on the comments in the Office Action, in order to allege finding of this combination of features the Examiner would need to combine four prior art documents: Nakagawa, Schindler, Montlick, and Geaghan. The combination of such a number of documents to allegedly find the claimed features in itself point to the non-obviousness of the claimed features.

The portion of Geaghan identified by the Examiner, col. 14 line 4, makes no reference to polling. Nonetheless, the Applicants make the following observations in response to any suggestion that the polling feature of claim 40 is obvious.

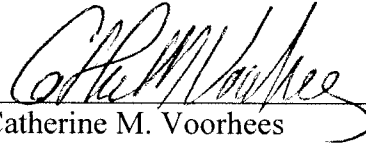
In Schindler, the remote devices are control devices, which control the apparatus with which they are in communication. For example, a remote device may send a command to turn off a VCR. It would not be possible for such control devices to be adapted to be such that they are polled. To do so would inhibit their operation, which requires them to control the devices with which they are associated. The communication of the remote devices in Schindler is therefore not compatible with a polling technique.

For the above stated reasons, it is submitted that all of the claims are patentable over the prior art of record and are in condition for allowance. Therefore, it is respectfully submitted that this application be passed to issuance with claims 21-42.

It is believed that no fee is due, however, the Director is hereby authorized to charge any deficiency in the fees filed, asserted to be filed or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Deposit Account No. 22-0261, under Order No. 45792-206763.

Should the Examiner believe that a conference would advance the prosecution of this application, he is encouraged to telephone the undersigned counsel to arrange such a conference.

Respectfully submitted,



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Date: July 24, 2008

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